

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

NOTICE OF MOTION

Defendant Baxter Healthcare Corporation (“BHC”) hereby gives notice of its Motion to Stay Proceedings Pending Transfer to the Judicial Panel on Multidistrict Litigation. Defendant BHC shall appear before the Court on Thursday, April 24 at 9:00 a.m., or as soon thereafter as can be heard for presentment of this motion, a copy of which is served upon you.

This the 18th day of April, 2008.

Respectfully submitted,

/s/ Leslie M. Smith, P.C.
Leslie M. Smith, P.C., Attorney No. 6196244
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601
telephone: (312)861-2000
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CERTIFICATE OF SERVICE

I, Leslie M. Smith, P.C. do hereby certify that a true and correct copy of the foregoing
NOTICE OF MOTION will be served by overnight delivery on Plaintiffs' counsel:

Susan E. Loggans & Associates, P.C.
33 N. La Salle Street
Suite 1710
Chicago, Illinois 60602 Tel: (312) 201-8600

This 18th day of April, 2008.

/s/ Leslie M. Smith, P.C.
Leslie M. Smith, P.C.